

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Case No. 1:19-CR-00117-RJJ

Plaintiff,

v.

Hon. Robert J. Jonker

LARRY CHARLES INMAN,

Defendant(s).

**GOVERNMENT'S  
INITIAL PRETRIAL CONFERENCE  
SUMMARY STATEMENT**

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements (Rule 16(a)(1)(A))

☐

There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).

☒

There are the following written records of oral statements:

Summary of FBI Interview on August 01, 2018  
Summary of phone call to FBI on October 16, 2018  
Summary of phone call to FBI on October 17, 2018  
Summary of FBI Interview on December 07, 2018

The substance of which

☐

has been disclosed to defense counsel.

☒

will be disclosed to defense counsel by May 28, 2019 .

2. Written or Recorded Statements (Rule 16(a)(1)(B))

☐

There are no written or recorded statements or grand jury testimony of defendant.

☒

There are the following written or recorded statements or grand jury testimony:

(See attached continuation)

All written or recorded statements

☐

have been disclosed to defense counsel.

☒

will be disclosed to defense counsel by May 28, 2019 .

B. Defendant's Prior Record (Rule 16(a)(1)(D))

- ☒ The Government has made due inquiry and is not aware of any prior criminal record.
- ☐ The Government has disclosed defendant's prior criminal history.
- ☐ The Government is now making inquiry into defendant's prior criminal history. The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects (Rule 16(a)(1)(E))

- ☐ The Government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The Government has the following documents, tangible objects, and physical evidence:
- ☐ Drug Paraphernalia      ☐ Drug Records      ☐ Inventory (attached)
- ☐ Controlled Substances: \_\_\_\_\_
- ☒ Records: \_\_\_\_\_ (See attached continuation)
- ☐ Firearms: \_\_\_\_\_
- ☐ Other: \_\_\_\_\_
- ☒ The Government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
- ☐ State
- ☒ Federal:
- |                |           |           |                                   |
|----------------|-----------|-----------|-----------------------------------|
| Case No. _____ | 18-MJ-240 | Re: _____ | Search of Larry Inman             |
| Case No. _____ | 18-MJ-241 | Re: _____ | Search of Larry Inman's residence |
| Case No. _____ |           | Re: _____ |                                   |
- ☒ They have been made available for inspection and copying by defense counsel.
- ☐ Defense counsel should make arrangements with: \_\_\_\_\_

D. Reports of Examinations and Tests (Rule 16(a)(1)(F))

- ☐ The Government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☒ The Government has or expects to have reports of the following examinations and tests:
- ☐ Drug Analysis      ☐ Handwriting      ☐ Fingerprints
- ☐ DNA      ☐ Firearms/Nexus      ☐ Gun Operability
- ☐ Computer Forensics      ☒ Other: \_\_\_\_\_ Cell phone data extraction

E. Reciprocal Discovery

- ☒ The Government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☐ The Government does not presently intend to introduce 404(b) evidence.
- ☒ The Government does presently intend to introduce the following 404(b) evidence:

Defendant's solicitation of campaign contributions from the International Brotherhood of Electrical Workers via text messages on June 1, 2018, that reference the impending prevailing wage vote in the Michigan House of Representatives.

- ☐ The Government will provide pretrial notice of 404(b) evidence by \_\_\_\_\_.

G. Other Discovery Matters

II. TRIAL

- A. The Government requests a ☒ jury ☐ non-jury trial.
- B. The length of trial excluding jury selection is estimated at three days.

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

- ☒ The Government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.
- ☐ The Government is aware of the following potential conflicts:

- ☒ Government's plea negotiation policy:

The government will not move for a one-level decrease in the offense level under U.S.S.G. § 3E1.1(b) for early acceptance of responsibility if the defendant pleads guilty less than 14 days before the final pretrial conference.

Date May 23, 2019

/s/ Christopher M. O'Connor  
Counsel for the United States

*United States of America v. Larry Charles Inman*  
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**Continuation of Government's  
Initial Pretrial Conference Summary Statement**

Written or Recorded Statements (Rule 16(a)(1)(B))

- Consensually-monitored and recorded phone call between “Person A” and Larry Inman on June 19, 2018
- Statements made to *Michigan's Big Show* in an audio-recorded interview on May 16, 2019
- Statements made to *The Detroit News* in a video-recorded interview on May 16, 2019
- Statements made to *MLive.com* in a video-recorded interview on May 16, 2019
- Statements made to the *Detroit Free Press* in a video-recorded interview on May 16, 2019

Documents and Tangible Objects (Rule 16(a)(1)(E))

- Huntington National Bank records
- AT&T phone records
- Michigan Regional Council of Carpenters and Millwrights records
- Data (including text messages) extracted from the Samsung cellular telephone seized and searched at Defendant's residence on August 1, 2018, pursuant to a federal search warrant
- Text messages provided by International Brotherhood of Electrical Workers